



**WILTSHIRE
TENNIS**

Anti-fraud, Bribery and Corruption Policy

Document Control

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1 INTRODUCTION

- 1.1 It is important that we are aware of the risk of, and means of enforcing, the rules against fraud, bribery and corruption. This document sets out the policy for detected or suspected fraud and incorporates best practice within the field regarding counter-fraud measures and takes account of the latest legislation.
- 1.2 There are procedures in place that reduce the likelihood of fraud, bribery or corruption occurring. These include appropriate policies, procedures, rules and regulations, a system of internal control and a system of risk assessment. In addition, the organisation tries to ensure that a risk (and fraud) awareness culture exists.
- 1.3 Although, the Trustees and Executive Management hold primary responsibility for preventing fraud, bribery and/or corruption, it is recognised that all employees, members, volunteers and other individuals have a part to play in ensuring the effectiveness of this policy. It is expected that employees and volunteers at all levels will lead by example in acting with the utmost integrity and ensuring adherence to all relevant regulations, policies and procedures. A culture of openness, honesty and probity is strongly encouraged.

2 DEFINITIONS

“**Fraud**” is theft by deception. It is any deliberate intent to permanently deprive a person or organization of money or goods through the falsification of any records or documents.

“**Bribery**” is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber.

“**Corruption**” is where someone is influenced by bribery, payment or benefit in kind to unreasonably use their position to give some advantage to another.

“**Theft**” includes any misappropriation, stealing, malicious damage, and actual or attempted break-in.

3 POLICY

- 3.1 The organisation is committed to maintaining an honest, open and well-intentioned atmosphere. It is therefore also committed to the elimination of any fraud, bribery or corruption and to the rigorous investigation of any such cases.
- 3.2 The organisation expects anyone having any reasonable suspicions of fraud, bribery or corruption to report them. It recognises that whilst cases of theft are usually obvious, there may only be a suspicion of fraud, bribery or corruption and thus employees must report any concerns to their line manager or other suitable persons, who can then ensure that procedures are followed.
- 3.3 It is also the policy, which will be rigorously enforced, that no employee will suffer in any way as a result of reporting reasonably held suspicions. All employees can therefore be confident that they will not suffer in any way as a result of reporting, in good faith, reasonably held suspicions of fraud, bribery or corruption.

4 ROLES AND RESPONSIBILITIES

This section states the roles and responsibilities of different individuals in reporting fraud, bribery or corruption.

- 4.1 Employees
 - 4.1.1 Employees are expected to act in accordance with rules regarding Conflicts of Interest. Employees also have a duty to protect the assets of the organisation, including information and

goodwill as well as property. The policies, procedures, rules and regulations place an obligation on all employees to act in accordance with best practice.

4.2 Trustees, Officers and Members of the Executive Committee

4.2.1 Trustees, Officers and Members of the Executive Committee are subject to the same high standards of accountability as employees and are required to declare and register any interests that might potentially conflict with those of Avon Tennis.

5 REPORTING FRAUD, BRIBERY OR CORRUPTION

5.1 This section outlines the action to be taken where fraud, corruption or other illegal acts involving dishonesty, are discovered or suspected. Reporting of all frauds and irregularities is essential to ensure:

- (a) consistent treatment of information.
- (b) proper investigation by an independent and experienced team.
- (c) the optimum protection of Avon Tennis' interests.

5.2 Any actual or suspected instance of fraud or corruption must be reported to the Chair immediately, with copies of any documents which are relevant. It is essential that individuals act at the time of their concerns, as time is likely to be of the utmost importance to prevent further loss. However, individuals must not confront any individual that they suspect directly, nor must they contact the police directly.

5.3 If an employee suspects their line manager, the employee should report the suspicions to someone more senior. If the suspicion involves a member of the Executive Management team, the matter will be reported to one of the Trustees.

6 POLICE INVOLVEMENT

6.1 Where financial impropriety is discovered, the organisational expectation is that the police will be involved. Any referral to the police will not prohibit action being taken under the Disciplinary Policy or Procedure.

7 UNFOUNDED ALLEGATIONS

7.1 All staff receive statutory protection (Public Interest Disclosure Act 1998) where they have disclosed information 'reasonably and responsibly in the public interest'. Staff raising genuine concerns which, following investigation prove unfounded, will be informed of the outcome. Any employee who knowingly discloses false/misleading information or makes malicious allegations, will not be protected by statutory provisions and will be subject to investigation and disciplinary action as appropriate.

8 WARNING SIGNS

8.1 Whilst by no means being proof on their own, the circumstances below may indicate fraud, and should therefore raise suspicions:

- (a) altered documents (correcting fluid, different pen or handwriting).
- (b) claim form details not readily checkable.
- (c) changes in normal patterns, e.g. of cash takings or travel claim details.
- (d) text erratic or difficult to read or with details missing.
- (e) delay in completion or submission of claim forms.
- (f) lack of vouchers or receipts in support of expense claims, etc.
- (g) employees seemingly living beyond their means.
- (h) employees under constant financial or other stress.
- (i) employees choosing not to take annual leave (and so preventing others becoming involved in their work), especially if solely responsible for a 'risk' area.
- (j) complaints from the public or from employees.
- (k) insistence on dealing with a particular individual.

- 8.2 It is an offence under the Bribery Act 2010 for someone to corruptly accept any gift or consideration as an inducement or reward for doing, or refraining from doing, anything in their official capacity, or showing favour or disfavour to any person in their official capacity.
- 8.3 Furthermore, under the Prevention of Corruption Act, any money, gift or consideration received from a person or organisation holding, or seeking to obtain, a contract, will be deemed to have been received corruptly unless they prove to the contrary. It is therefore essential for them to declare any gifts or considerations received to the Secretary and to obtain written approval for the retention of the gift. Such approval is to be recorded in the Gifts, Rewards and Hospitality Register.

9 REVISION OF POLICY

- 9.1 The organisation reserves the right to amend and/or withdraw this policy from time to time for any reason, including without limitation, to take account of changes in the law, best practice and/or operational requirements.